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December 17, 2021

Honorable Esther Salas, USDJ  
U.S District Court for the District  
Martin Luther King Jr. Federal Bldg  
50 Walnut Street  
Newark, NJ 07102

Filed Via ECF

**RE: International Transport Management Corp, et al v. Brooks Fitch,  
Apparel Group, LLC, et al;** Civil Action No: 11-cv-1921

Dear Judge Salas:

As the record reflects, I entered my appearance on behalf of the defendants in the above captioned matter and filed a motion for reconsideration and/or to vacate the judgment.

Unfortunately, my office has reached an impasse with Mr. Safdieh and as a result I was forced to terminate my representation under the terms of my retainer agreement. I recognize that Brooks Fitch must be represented by counsel and I have advised Mr. Safdieh accordingly. A cursory review of the docket reveals my client seem very familiar with having to hire new attorneys in this case.

I assume that Defendants' new attorneys will review my motions and determine how they wish to proceed. Should the Court require any additional information from me, please do not hesitate to contact my office.

Respectfully submitted

BY:

  
Andrew M Smith, Esquire

Cc: George Murray, Esquire (via ecf)